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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

DR MANAGEMENT, LLC, a Delaware
limited liability company; DR
ACQUISITIONS I, LLC, a Delaware limited
liability company; DR HOLDINGS, LLC, a
Delaware limited liability company;
JENNIFER LIN; FREDERICK LIN; and
KEVIN LIN,

Plaintiffs,

v.

UNITED STATES OF AMERICA et. al.,

Case No. 05-1010 MMC

STIPULATION FOR STAY OF
PROCEEDINGS; ORDER THEREON

1 Defendants.)
2)
3 _____)

4 Pursuant to Civil L. R. 7-1(5) and 7-12, the parties hereby stipulate and agree
5 that all proceedings, including discovery, in the above-captioned action shall be stayed
6 pending the outcome of settlement negotiations.

7 Following the settlement conference held on August 30, 2006 before Magistrate
8 Judge Elizabeth D. Laporte and pursuant to the Magistrate's ensuing Order [Doc. #16],
9 plaintiffs submitted a written settlement offer to defendant on September 13, 2006.
10 Defendant is now processing the offer in accordance with the standard procedures of
11 the Department of Justice.

12 To permit negotiations on settlement to move forward and promote the potential
13 settlement of this case, the parties request the Court now stay all proceedings, including
14 discovery. If the case settles, a stay will avoid unnecessary expenditure of substantial
15 party and judicial resources on discovery and trial.

16 In accord with Magistrate Judge Laporte's Order [Doc. #16], during the stay,
17 defendant will keep the Magistrate informed of any developments. In addition, if, at any
18 time, it appears that reasonable progress towards settlement is not being made, the
19 parties will contact the Court to reinstate discovery and trial of this case.

1 THEREFORE, it is stipulated and agreed by the undersigned that all
2 proceedings, including discovery, in these actions be STAYED pending the outcome of
3 settlement negotiations.

4
5 FOR THE PLAINTIFFS

6 Robert D. Infelise
7 Monali S. Sheth
8 Cox, Castle & Nicholson LLP

9 Date: October 4, 2006

10 By s/Robert D. Infelise
11 Robert D. Infelise
12 Attorneys for Plaintiffs

13 FOR THE UNITED STATES

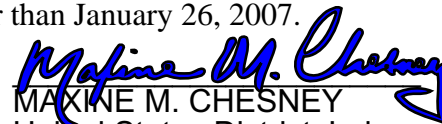
14 UNITED STATES ATTORNEY
15 Kevin V. Ryan, Esq.
16 Jay R. Weill, Esq.
17 Robert J. Higgins, Esq.
18 Bart D. Jeffress, Esq.

19 Date: October 5, 2006

20 By s/Robert J. Higgins
21 Robert J. Higgins
22 Attorneys for Defendant

23 PURSUANT TO STIPULATION, IT IS SO ORDERED, and, in addition, the status
24 conference scheduled for October 27, 2006 is continued to February 2, 2007. A joint status
25 conference statement shall be filed no later than January 26, 2007.

26 Date: October 6, 2006

27 
28 MAXINE M. CHESNEY
 United States District Judge